

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No.: 05-CV-11080-GAO

JANE DOE,)
Plaintiff,)
v.)
SHERIFF OF ESSEX COUNTY d/b/a)
ESSEX COUNTY CORRECTIONAL ALTERNATIVE)
CENTER, FRANK G. COUSINS, JR., Individually,)
and in his Official Capacity as Sheriff of Essex County,)
ANDOVER HOUSING AUTHORITY, and)
CHRISTINE METZEMAKERS, Individually, and in her)
Official Capacity as Executive Director of the Andover)
Housing Authority,)
Defendants.)

**PLAINTIFF'S ASSENTED TO MOTION TO REMAND THE
ABOVE-CAPTIONED CASE BACK TO THE ESSEX COUNTY
SUPERIOR COURT**

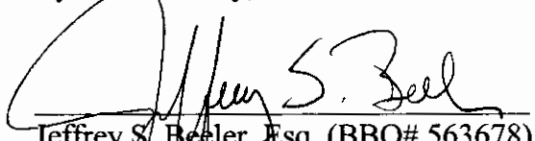
Since this Court lacks subject matter jurisdiction over the above-captioned matter, the Plaintiff hereby requests an Order remanding this case back to the Essex County Superior Court. In support of this motion, the Plaintiff states the following:

1. The parties have discussed this issue and have agreed that the best way to resolve the procedural issues presented in this case is to have this case remanded, by agreement, back to the Essex County Superior Court to address, as appropriate, any misnomer of parties to reflect the real parties in interest.

2. All other parties have assented to this motion.

WHEREFORE, the Plaintiff, with the assent of all other parties,
respectfully requests that the Court grant this motion and remand this case to the
Essex County Superior Court.


Respectfully Submitted,
The Plaintiff,
By Her Attorney,



Jeffrey S. Beeler, Esq. (BBO# 563678)
HEINLEIN & BEELER, P.C.
207 Union Street
South Natick, MA 01760
(508) 655-8700 (Tel)
(508) 655-2700 (Fax)

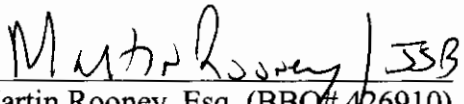
Assented to:

Sheriff of Essex County d/b/a Essex County Correctional Alternative,
Frank G. Cousins Jr., in his official capacity and
Frank G. Cousins Jr., Individual,
By Their Attorney,



Stephen C. Pfaff, Esq. (BBO# 553057)
Merrick, Louison & Costello
67 Batterymarch Street
Boston, MA 02110
(617) 439-0305 (Tel)
(617) 439-0325 (Fax)

Andover Housing Authority, Christine Metzmakers, Individually,
and in her Official Capacity as Executive Director of
the Andover Housing Authority

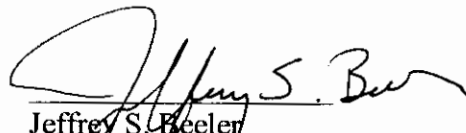

Martin Rooney, Esq. (BBO# 426910)
Curley & Curley
27 School Street
Boston, MA 02108
(617) 523-2990 (Tel)
(617) 523-7602 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on this 19 day of July, 2005, I served a true and
accurate copy of the foregoing document by first class mail, postage prepaid on:

Martin Rooney, Esq.
Curley & Curley
27 School Street
Boston, MA 02108

Stephen C. Pfaff, Esq.
Merrick, Louison & Costello
67 Batterymarch Street
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Jeffrey S. Beeler